

John P. Doyle Jr.
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December 8, 2020

VIA E-MAIL ONLY

Larry D. Carbonneau
Manager, Healthcare Compliance & Operations
Div. of Licensing & Certification
State of Maine, DHHS
11 State House Station
41 Anthony Avenue
Augusta, ME 04333-0011

Richard S. Lawrence
Senior Healthcare Financial Analyst
Div. of Licensing & Certification
State of Maine, DHHS
11 State House Station
41 Anthony Avenue
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RE: NSTR –Transfer of Ownership Interests in Maple Grove Nursing Home, Inc, d/b/a Madigan Estates Among Brown Family Members

Dear Larry and Rich:

This Letter of Intent / Non-Applicability Request is filed in connection with the proposed transfers certain ownership interests in Maple Grove Nursing Home, Inc, d/b/a Madigan Estates, a 99 bed skilled nursing facility located in Houlton, Maine (“Maple Grove”).

The transfers will take place among member of the Brown family, long-time owners of this nursing facility. The ownership interests in Maple Grove are currently held by three members of the Brown family: Brenda Brown (mother) 40%; James Brown 30% (son and brother); and Deborah Lacombe 30% (daughter and sister). Following completion of the proposed transfers (collectively the “Proposed Transfers”), James will hold 100% of the ownership interests in Maple Grove. The transfers will be effectuated through Brenda gifting her interests equally to James and Deborah. James will then end up with 100% ownership following either a purchase of Deborah’s stock or a stock redemption of her interests by the Maple Grove company.

We believe the Proposed Transfers are not subject to review under the CON law as:

- The legal entity owning the facility will continue to be the Maple Grove corporation;
- James Brown, long-time administrator, will continue in this capacity; and
- All programs and staffing will continue as presently configured.

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Because the Proposed Transfers are not subject to review, we do not believe a Technical Assistance Meeting is applicable or necessary. However, should you have questions or wish to meet with us to review this filing or review additional information, we would be most willing to confer with you at your earliest convenience.

It is presently anticipated that the Proposed Transfers will be completed between now and December 31, 2020, following receipt of clearance from DHHS to proceed. We apologize for the late notice and would be most grateful if you could provide us with a confirming "NSTR" ruling as soon as practicable in light of the planned timing of the closing.

I will be in touch to confirm your receipt of this request, and to provide any additional information you may seek.

Sincerely,

A handwritten signature in black ink, appearing to read "John P. Doyle Jr.", with a stylized flourish at the end.

John P. Doyle Jr.

JPD/nc

Enclosure

cc: James Brown